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Paul Sweeny

BY CM/ECF

Hon. Philip M. Halpern
United States District Court
Southern District of New York
300 Quarropas Street, Room 530
White Plains, New York 10601

Re: *Donohue, et al. v. The Clorox Company*
No. 2:22-cv-10450-PMH



**SQUITIERI &
FEARON LLP**

Application granted. The Clerk of Court is respectfully directed to terminate the pending motion at Doc. 58.

SO ORDERED.

Philip M. Halpern
United States District Judge

Dated: White Plains, New York
March 22, 2024

Dear Judge Halpern:

We write to advise that Plaintiffs and Defendant have met and conferred regarding a proposed Protective Order to be entered in this action. Pursuant to Paragraph 1.I of Your Honor's Individual Practices in Civil Cases, the parties are submitting to the Court for signature the proposed stipulated confidentiality agreement and protective order available on this Court's website without any substantive changes. *See* Exhibit A, Stipulated Confidentiality Agreement and Protective Order. If the parties' proposed Protective Order meets with Your Honor's approval, the parties respectfully request that Your Honor enter it.

The parties have also met and conferred regarding a proposed ESI Protocol to be entered in this action. In addition to the Proposed Protective order, the parties are submitting their proposed ESI protocol as Exhibit B. If the proposed ESI Protocol meets with Your Honor's approval, the parties respectfully request that Your Honor enter the proposed ESI Protocol

The parties are available at Your Honor's convenience to address any questions the Court may have.

Respectfully submitted,

SQUITIERI & FEARON, LLP
Attorneys for Plaintiffs

By: /s/ Paul Sweeny
Paul Sweeny

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Attorneys for Defendant

By: /s/ Lindsey Heinz
Lindsey Heinz

cc: All Counsel of Record (via CM/ECF)